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December 20, 2021

VIA ECF FILING

Honorable Leda Dunn Wettre
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *Sawhney v. Chubb Insurance Company of New Jersey*
United States District Court for the District of New Jersey
Docket No. 2:21-cv-14675-KSH-LDW

Dear Judge Wettre:

This firm represents Chubb Insurance Company of New Jersey (“Chubb Insurance”) in the above-captioned matter. Richard Fogel, Esquire represents Plaintiffs Ramesh Sawhney and Nina Bhardwaj (“Plaintiffs”). Counsel for the parties write to jointly request a thirty-day extension of time for Chubb Insurance to answer or move to dismiss Plaintiffs’ Complaint. The basis for this request is that the parties continue to discuss a cooperative resolution of this matter outside of litigation. The parties’ discussions have advanced since our last joint correspondence to the Court on October 19, 2021. Importantly, the parties and their counsel also conducted a joint inspection (on November 30 and December 1, 2021) of the insureds’ art which is the subject of the insurance claim involved in this litigation. Plaintiffs have now requested a follow-up inspection with their conservator(s) present and Chubb Insurance has agreed to this request. The parties are attempting to schedule this follow-up inspection in early January 2022. Counsel for the parties believe that at a minimum, their ongoing discussions and the inspections of Plaintiffs’ art will narrow the scope of the instant dispute. The ultimate hope is that the parties are able resolve the entire dispute without the need for further litigation.

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Accordingly, the parties respectfully request a joint extension of time for Chubb Insurance to answer or move to dismiss Plaintiffs' Complaint until January 21, 2022. Thank you for considering this request. If there is any additional information you would like the parties to provide, please let us know.

Respectfully,

MCCLELLAN BERNSTIEL, LLP

/s/ George McClellan, Esquire
GEORGE McCLELLAN, ESQUIRE

LAW OFFICES OF RICHARD A. FOGEL, P.C.

/s/ Richard A. Fogel, Esquire
RICHARD A. FOGEL, ESQUIRE